

1 LEON DAYAN (State Bar No. 153162)
ABIGAIL V. CARTER*
2 RAMYA RAVINDRAN*
LANE M. SHADGETT*
3 J. ALEXANDER ROWELL*
BREDHOFF & KAISER P.L.L.C.
4 805 Fifteenth Street NW, Suite 1000
Washington, DC 20005
5 Telephone: (202) 842-2600
Facsimile: (202) 842-1888
6 ldayan@bredhoff.com
acarter@bredhoff.com
7 rravindran@bredhoff.com
lshadgett@bredhoff.com
8 arowell@bredhoff.com
*Application *pro hac vice* forthcoming

9 Daniel Feinberg, SBN 135983
10 Catha Worthman, SBN 230399
Anne Weis, SBN 336480
11 **FEINBERG, JACKSON, WORTHMAN
& WASOW, LLP**
12 2030 Addison Street, Suite 500
Berkeley, CA 94704
13 Tel. (510) 269-7998
Fax (510) 269-7994
14 dan@feinbergjackson.com
catha@feinbergjackson.com
15 anne@feinbergjackson.com

16 *Attorneys for Plaintiffs*

17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN FRANCISCO DIVISION**

20 AMERICAN FEDERATION OF
21 GOVERNMENT EMPLOYEES, AFL-CIO, et
al.,

22 Plaintiffs,

23 v.

24 DONALD J. TRUMP, in his official capacity as
25 President of the United States, et al.,

26 Defendants.
27
28

Case No.: 3:25-cv-03070-JD

**DECLARATION OF CORRIE
WILLSON**

DECLARATION OF CORRIE WILLSON

I, Corrie Willson, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am a Program Officer at the United States Agency for International Development (“USAID”). I have worked at USAID since 2017 and have worked in my current role for two years. In this role, I provide technical assistance to support a hub dedicated to advancing research, innovation, and science to achieve international development goals.

3. I am a member of the American Federation of Government Employees Local 1534 (“Local 1534” or the “Union”).

4. Local 1534 represents approximately 800 civil servants who work for USAID. The March 27, 2025 Executive Order titled “Exclusions from Federal Labor Management Relations Programs” (“Executive Order”) appears to cover all of the USAID workers in Local 1534’s bargaining unit. I was surprised by this, as my work is explicitly “sector and geographic agnostic” and is neither related nor critical to national security.

5. Local 1534’s mission is to advocate for and promote the interests of bargaining unit members in their federal employment, including working for a safe and fair workplace for all members. As the exclusive bargaining representative of these workers, the Union provides many services to all bargaining unit members. Core functions of the Union include collective bargaining with the agency to obtain a fair and reasonable collective bargaining agreement (“CBA”); filing and negotiating grievances against the agency to enforce the terms and conditions of the CBA; pursuing arbitrations on behalf of workers to enforce the CBA; and providing other support, guidance, and resources to bargaining unit employees. I rely on the Union to gain a clearer understanding of my rights as an employee. Without the Union, I would be left to navigate complex legal matters and workplace rights on my own.

6. The Executive Order will have an immediate adverse effect on the Union’s ability to provide these services to unit members and to accomplish its mission.

1 7. If the Union is no longer the exclusive bargaining representative of the unit, the
2 Union cannot enforce the CBA against USAID. The CBA provides important rights and
3 protections to workers. For instance, the CBA:

- 4 a. Sets terms and conditions for working hours, overtime, sick leave, holidays, and
5 paid time off for workers in the unit.
- 6 b. Imposes safety and health requirements to ensure the welfare of workers in their
7 place of employment.
- 8 c. Establishes protections for workers regarding reduction-in-force (“RIF”) actions
9 and procedures.
- 10 d. Imposes procedures for and limitations on disciplinary and adverse actions against
11 workers.
- 12 e. Provides for an Employee Assistance Program for individuals who have problems
13 associated with alcohol, drug, marital, family, legal, financial, stress, attendance,
14 and other personal concerns.
- 15 f. Establishes grievance and arbitration procedures for employees and the Union to
16 resolve disputes with the agency over employment matters.
- 17 g. Provides for official time, which allows bargaining unit employees to perform
18 union representation activities during certain amounts of time the employee
19 otherwise would be in duty status, without loss of pay or charge to annual leave,
20 and on agency property.

21 Without the Union to represent us and enforce the CBA, the workers will not have the
22 benefit of those rights and protections going forward. I understand that USAID is also likely to
23 rescind the CBA under the Executive Order.

24 8. As a result of the Executive Order, pending grievances and arbitrations to
25 vindicate workers’ rights, including under the CBA, will be left unresolved. I am aware of two
26 institutional grievances filed by Local 1534, one concerning the termination of probationary
27 employees and one concerning USAID’s intent to subject workers to a reduction in force.

1 9. The Union's staff and activities are funded through members' voluntary dues. If
2 the Union can no longer receive dues under the Executive Order, that will make it significantly
3 more difficult for the Union to continue to function or provide any of its services or protection to
4 the members listed above.

5 10. The Executive Order is chilling workers' speech and activity. I am afraid to raise
6 concerns about management or to criticize this Presidential Administration, even on my personal
7 devices and accounts. I know firsthand that without the protections of the CBA and the Union,
8 workers will be even more fearful to raise concerns over workplace conditions with USAID.
9 Additionally, because this Executive Order targets federal unions and their employees, I am
10 reluctant to criticize the administration or voice political views the administration may not
11 approve of, for fear of further retaliation. I understand from my interactions with other federal
12 employees that many of them feel the same way.

13 I declare under penalty of perjury under the laws of the United States that the foregoing is
14 true and correct. Executed April 1, 2025, in Arlington, Virginia.

15
16 

17 _____
18 Corrie Willson
19
20
21
22
23
24
25
26
27